

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
Tampa Division**

UNITED STATES OF AMERICA

v.

Case No. 8:03-CR-77-T-30TBM

SAMI AMIN AL-ARIAN, et al.

Defendants.

MOTION FOR EXTENSION TO FILE

COMES NOW the Accused, Dr. Sami Amin Al-Arian, by counsel, and files this Motion for Extension to File his reply to the Government's response to his motion to suppress all evidence seized by the United States Government pursuant to searches conducted in 1995 and 2003. Dr. Al-Arian respectfully requests an extension of 48 hours in which to file his reply, which would extend the deadline from Monday, January 24, 2005 to Wednesday, January 26, 2005. The reasons for this request are set forth below.

1. On Wednesday, January 19, 2005, heavy snow fell over the Washington, D.C. area making it impossible for Mr. Moffitt to get to the office;

2. On Thursday, January 20, 2005, the downtown Washington, D.C. area was shut down for the presidential inauguration, including extensive road closures. Access to the particular street on which Mr. Moffitt's office is located was restricted due to the heightened security for the inaugural event. The roads were not re-opened until at least after 9:30 p.m. As such, the office was closed.

4. On Thursday, January 20, 2005, Mr. Moffitt fell down on the ice and hyperextended his knee. An MRI will likely be performed when the swelling goes down.

5. On Saturday and Sunday, January 22-23, 2005, the District of Columbia is expecting 6-8 inches of snow which will make it impossible to spend any significant time in the office with staff.

6. On Friday, January 21, 2005, we contacted the government before filing this motion for extension of time to file and they had no objection to granting this motion.

CONCLUSION

For the foregoing reasons, Defendant respectfully requests a 48 hour extension to file his reply to the Government's response to his motion to suppress.

Dated: 21 January 2005

Respectfully submitted,

/s/Linda Moreno

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of January, 2005, a true and correct copy of the foregoing has been furnished, by CM/ECF, to Walter Furr, Assistant United States Attorney; Terry Zitek, Assistant United States Attorney; Kevin Beck, Assistant Federal Public Defender, M. Allison Guagliardo, Assistant Federal Public Defender, counsel for Hatim Fariz; Bruce Howie, Counsel for Ghassan Ballut, and by U.S. Mail to Stephen N. Bernstein, P.O. Box 1642, Gainesville, Florida 32602, counsel for Sameeh Hammoudeh.

/s/ Linda Moreno
Linda Moreno
Attorney for Sami Al-Arian